



Norman H. Bangerter

Governor

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Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple

3 Triad Center, Suite 350

Salt Lake City, Utah 84180-1203

801-538-5340

November 14, 1990

Mr. Allen Childs
Genwal Coal Company
P.O. Box 1201
Huntington, UT 84528

Dear Mr. Childs:

Re: Deficiencies, Mining and Reclamation Plan, Genwal Coal
Company, Crandall Canyon Mine, ACT/015/032, Folder #2,
Emery County, Utah

On October 17, 1990, the Division recieved revised copies of Chapters 3 & 7 of Genwal Coal Company's "Mining and Reclamation Plan" from Earthfax Engineering Inc. The copies have been reviewed and found inadequate for insertion into the Mine Plan. Many of the recent approved changes at the Crandall Canyon site have not been included in this submittal. For example, Chapter 3 still includes references to the power generator, fuel containment area, and utility poles which have all been removed.

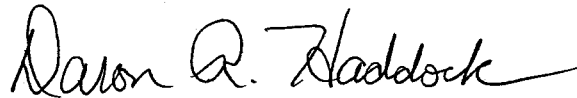
We are returning the copies to you in order for you to make the necessary changes to bring the Mining and Reclamation Plan up to date. This would be a good time to incorporate all of the recent changes into your MRP, which would include the bulk oil storage, the new shop, the coal silo plans and as-builts.

Other items which you should also address at this time are enumerated in the enclosed technical memo authored by Priscilla Burton, Soils Specialist. These items were brought to light as a result of a courtesy inspection conducted on October 25, 1990.

Page 2
Mr. Allen Childs
ACT/015/032
November 14, 1990

Please make all the required changes and submit 10 copies for distribution to other agencies by January 14, 1990. If you have any questions, please call Rick Summers or me.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock". The signature is written in dark ink and is positioned above the typed name.

Daron R. Haddock
Permit Supervisor

DRH/jbe
Enclosures
cc: R. Summers
P. Burton
BT46/68-69



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November 9, 1990

TO: Daron Haddock, Permit Supervisor

FROM: Priscilla Burton, Soils Specialist *PB*

RE: Crandall Canyon Mine, Genwal Coal Co., ACT 015/032,
Carbon County, Utah, (Folder #2).

SYNOPSIS:

After a courtesy inspection October 25, 1990, I have reviewed the Crandall Canyon Mining and Reclamation Plan (submitted Feb 10, 1988) and found discrepancies between the MRP and the actual operations. All are contained in Volume three of the MRP and are listed below.

TECHNICAL ANALYSIS:

1. Sec 8.3-2, p 8-3. Only 2 soil stockpiles are included in this discussion of mass balance. Three stockpiles are shown on Plate 3.8 and three stockpiles are evident at the site. The volume of soil in stockpiles #3 as per Plate 3.8 should be included in the mass balance. Any resulting change in mass balance should be noted in Sec 8.3-2, p8-3 and Sec 8.7, p8-8.

2. Sec 8-6. This section describes the separate storage of subsoil from the JDE and TCE soil types. Plate 3.8 does not indicate which storage piles are subsoil and which are topsoil.

3. Sec 8-7, pg 8-7. This section describes earthen berms that will be constructed around the topsoil piles. Straw bales are being used instead. Lyn Kunzler, Randal Ralphs (Genwal Coal Co.) and I discussed eliminating the use of strawbales on portions of the piles, since the piles have a good establishment of vegetative cover and show no erosion. It was agreed that straw bales would still be used by the roadside and at the toe end of the slopes.

4. Sec. 8-7, pg 8-8. This section describes the use of a fence to protect the topsoil piles from the public. No fence was seen at the site. This section also describes a stockpile of topsoil and subsoil adjacent to the public parking area at the end of the USFS road. No stockpile was seen at this location.

5. Plate 3.8. This plate shows cross-sectional and contour views of three topsoil piles. The location of topsoil stockpiles with respect to the surface facilities is not shown on this

plate, although that is stated on pg 8-7. Adjacent to Topsoil pile #2 there is an area that is labeled "future topsoil stockpile." This area is not within the UDOGM disturbed area boundary. This area is currently permitted by the Forest Service as a gravel storage area.

6. Sec 8-5, p8-4 lists the location of the chemical analysis of the coal in Appendix 5-2. This Appendix in Vol 1 contains "Cultural Resource, Determination of Effect," not a chemical analysis. The MRP must correctly site the location of these coal analyses.

RECOMMENDATION:

Genwal Coal Co. must correct those portions of the Mining and Reclamation Plan that do not accurately reflect conditions at the site (Items #1,3,4) and those portions of the plan that have omissions of detail (Items #1,2,5,6) and prior to using the Forest Service roadside area for a "future topsoil stockpile," the area must be placed within DOGM's disturbed area boundaries.

pb

cc: B-Team